



U.S. Department of Justice

*United States Attorney  
Eastern District of New York*

EAG: CMP  
F.#2008R00530

271 Cadman Plaza East  
Brooklyn, New York 11201

March 16, 2011

By Hand Delivery & ECF

The Honorable Brian M. Cogan  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Thomas Gioeli & Dino Saracino  
Criminal Docket No. 08-0240 (S-6) (BMC)

Dear Judge Cogan:

As anticipated, defendants Thomas Gioeli and Dino Saracino have moved for an adjournment of the trial in the above-captioned matter, which is currently scheduled to commence on May 9, 2011. In light of the Court's scheduling of a status conference for March 23, 2011, to address the defendants' motion, the government respectfully requests an additional one-week adjournment of the date on which the government is required to file its pre-trial motions, which date is currently March 18, 2011. Should the Court grant the defendant's adjournment request, the government further requests that the Court set a new motion schedule.

Respectfully submitted,

LORETTA E. LYNCH  
United States Attorney

By: /s/ Elizabeth A. Geddes  
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cc: Joseph Corozzo, Esq. (via ECF)  
Adam Perlmutter, Esq. (via ECF)